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May 22, 2020

VIA ECF

The Honorable Lewis J. Liman
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Schepis et al v. JPMorgan Chase Bank, N.A. et al*
1:20-cv-02647-LJL

Dear Judge Liman:

The undersigned represents the Plaintiffs in the above-referenced action. The purpose of this letter is to respectfully request a three-week adjournment of the initial telephonic pretrial conference scheduled for May 29, 2020. (ECF 19). In this same regard, the Plaintiffs request an extension, from May 22, 2020 to June 12, 2020, for the parties to jointly submit to the Court a proposed Case Management Plan and Scheduling Order.

The reason for this request is that the undersigned is advised by Plaintiffs' process server, Empire State Legal Services, that it has yet to successfully serve this action upon the defendants Peter S. Cane and CaneLaw, LLP ("the Cane Defendants"). Specifically, the process server has attempted on at least four (4) separate occasions to serve the Cane Defendants at their business address located at 200 Park Avenue, New York, NY 10166 and, on each such occasion, said offices have either had no one present, or the process server has not been permitted to access the offices by first floor building personnel for purposes of making place of business service. It is unclear to what extent the ongoing COVID-19 crisis has factored into the difficulties with service.

As the Cane Defendants are the parties in primary possession and control of the client funds at issue in this action, the Plaintiffs respectfully request the adjournment of the initial telephonic pretrial conference so that said defendants can be served and brought in as meaningful participants in this case.

Counsel for the proposed intervening defendants Claridge Associates, LLC, Jamiscott, LLC, Leslie Schneider and Lillian Schneider **consent** to this request. This is the **first** request for an adjournment and extension of time directed to these time frames. There are no additional scheduled appearances before the Court.

Thank you for consideration.


Sincerely,

Sabato P. Fiano

Adjournment GRANTED. The Initial Pretrial Conference scheduled for May 29, 2020 is adjourned and will be held instead on June 19, 2020 at 12:00 p.m. The deadline to submit the case management plan is extended to June 12, 2020. SO ORDERED.

5/27/2020

SO ORDERED.


LEWIS J. LIMAN
United States District Judge